

Passaic, Hackensack and Newark Bay Remediation Branch Weekly Report
May 6, 2020
Enforcement Confidential

RA or DD updates for the week of May 11, 2020:

- **Pierson's Creek:** EPA response to Troy Chemical letter is circulating for review prior to RA's review (but not signature). Steven Cook, HQ, was copied on Troy's letter.

Hot Issues:

Past Week:

Upcoming:

Regional Administrator's Pending Action Items:

<u>Subject</u>	<u>Date Sent to RA's Office</u>	<u>Required By/Due Date</u>	<u>Comments</u>

Other Items of Special Interest:

Non-RA Highlights:

Events List:

<u>Event Name</u>	<u>Start Date</u>	<u>End Date</u>	<u>Region</u>	<u>Event Type</u>	<u>Description</u>	<u>City</u>	<u>State</u>

Milestone Tracker:

<u>Site</u>	<u>Milestone</u>	<u>Project Manager</u>	<u>Projected Date</u>
Diamond Alkali OU4	PRAP	Diane Salkie	2020/4
Pierson's Creek OU2	ROD	Pam Tames	2021/1
Riverside Industrial Park	ROD	Josh Smeraldi	2020/4

Diamond Alkali OU1 (Lister Avenue):

- Groundwater sampling
 - Submittal of 2019 Annual Groundwater Report, Groundwater Sampling Event No. 10, and GWWS Update/Hydraulic Gradient Update – Estimated 6/1/20.
- Remedy of Site Evaluation Report Addendum submitted 4/30/20, under review by EPA and NJDEP, comments due 6/01/20.
 - Submittal of Revised Remedy Evaluation Report – 6 weeks from approval of Site Evaluation Report Addendum.

- GSH continues to update the NJPDES Permit Equivalent coordinating with NJDEP on proposed discharge limits for influent/effluent sampling.
- GSH submitted and revised and updated DASS Operation and Maintenance QAPP for EPA review and approval. QAPP under review by EPA.
- Completed draft OU1 oversight bill

Diamond Alkali OU2 (8.3 miles):

- Exemption 5, Attorney-Client Communication; Attorney work product; Exemption 7 (a), Enforcement



Diamond Alkali OU3 (Newark Bay Study Area):

- GSH submitted Lower 8-mile remediation schedule from GSH, revised schedule is under review by EPA to start no action run
- GSH submitted revised NBSA RI/FS schedule, including peer review of bioaccumulation model
- NBSA CSTAG's revised memo under review and EPA team working on preparing responses and investigating, looking into other RODs from R10
- PRG-RAO comment clarification meeting with GSH on 4/29, EPA preparing additional clarification requested
- RI Chapter 4: proposed reorganization by GSH is under review by EPA team
- Working on NBSA bioaccumulation modeling documentation that specifies that NBSA model is stand alone, independent and different from the LPRSA bioaccumulation model
- Completed draft of OU3 oversight bill

Diamond Alkali OU4 (17-Mile):

- Held FS meeting #29 on April 30th where the following discussed:
 - Remaining FS items/schedule
 - Confirmation of Y and N
 - Dredge to clean feedback
 - LOE framework, remaining source and addressing above RM 15 feedback
- Attended a CAG meeting on the Zoom platform and presented the FS and upcoming schedule as well as CSTAG's recommendations and the Region's responses.
- Set up the next FS meeting for May 7th.
- Continued to work on the draft Proposed Plan.

Universal Oil Products:

- Had a call on Site definition with Honeywell on 5/4/20. There seemed to be an agreement on how to move forward that addressed both sides concerns. They will send revised Figure, and language for order. We will send that revision to Eric Wilson/Pat Evangelista prior to sending out for signature.
- Annual cap maintenance and observation to occur mid-May.
- Need to send past cost bill within 2 weeks.
- Had call to discuss findings of VI work. Should be able to move ahead, had one concern about chloroform, but it does not appear to be site related.

Berry's Creek Study Area:

- Sent email clarifying COCs to be used in design efforts (basically want the same for BCSA and UOP).
- BCSA Group geotechnical borings should be occurring this week. Surveying should begin as well, coordinating with the LiDAR flyover. Health and Safety Plans have been updated to account for coronavirus.
 - Laboratory has informed RD team that they will not be able to complete all Treatability Study tasks due to shut down for coronavirus.
- BCSA Group preparing memo regarding erosion concerns from RBD discharge. Will send to RBD team when received – targeted for end of this week.
- RD Primer “Meeting” being held May 5 and 6.
- Need to send oversight bill within 2 weeks.

Ventron/Velsicol:

- No change from last week on this site.
- Document on summary of building on Undeveloped Portion of the site to be reviewed by 2nd week in May.
- **Exemption 5, Deliberative/Pre-decisional**
[REDACTED]
 - Jay Steinberg (Fruit of the Loom bankruptcy trustee) requested releasing a portion of the funds from the Trust for other projects that required money. ORC gathered some information and is preparing a response.
 - Randolph property (adjacent to site) drainage has been reworked, and now occasionally floods Ventron site. Had discussion with property owner and PRP representatives on site.
 - Need to review:
 - 2018 Annual Report
 - **Exemption 5, Deliberative/Pre-decisional; Attorney-Client Communication**
[REDACTED]
[REDACTED]
[REDACTED]

Standard Chlorine:

- RD/RA: Sent comments on 95% RD to PRPs on April 24 (received NJDEP comments on April 22; no new ARARs identified). 100% RD due in 60 days (June 23).
- O&M: Ongoing.
- Sent reply email to Anthony Pilawski, Section Chief, Bureau of Pretreatment and Residuals, on April 22; received same day reply that he believes no 121e permit exemption for residuals and will be seeking NJDEP legal opinion. Continuing to discuss with ORC.
- Redevelopment:
 - Pre-Design Investigation - update to HASP with COVID-19 precautions submitted on April 15. field work scheduled for mid-May.

- Next redevelopment plan anticipated to be submitted is sewer/water; scope of work currently in discussions among HCIA/Morris, Kearny Municipal Utilities Authority, and NJ Transit.
- **Exemption 5, Deliberative/Pre-decisional; Attorney-Client Communication**

Pierson's Creek:

- Received the draft RI for OU2 on 9/23/19. The BHHRA was submitted on 10/31/19. On 3/24/20, Geosyntec submitted the revised combined RI and BHHRA. It is currently under review. DEP's comments expected next week. Geosyntec's latest schedule has Troy submitting the draft FS on 5/29/2020.
- Troy sent a letter on 4/15/20 focusing on EPA's approach and would like to meet with EPA to discuss the schedule. Their schedule now estimates a December ROD. HQ (Steven Cook) was also copied on the letter. A draft letter is circulating for review as of 4/28/20.
- Received the draft SOW and AOC back from 429 Delancy on 9/17/19. A call was held with 429 Delancy on 11/20. Received the latest draft AOC from Amelia on 3/24 for review. 429 Delancy is not happy with this latest revision and is preparing a response. As of 5/5, no response has been received.
- The Troy invoice was sent out on 4/27/20.
- The future buyer (Salomone) of the Globe Metals (Oberwill) property performed construction on the site and dug up the unnamed tributary adjacent to Globe/Troy and replaced it with piping and drainage features. The Oberwill and Salomone notice letters were sent out on 4/20/20. A conference call has been scheduled for 5/7/20 to discuss. CDM assessed the soil stockpiles on 5/5/20 to determine if additional stabilization measures are necessary.
- Working on the RAF contracting reviews for the OU1 FS work.

Riverside Industrial Park:

- EPA approved the final versions of the RI, BHHRA, and the SLERA on 4/21.
- We received a draft FS on 4/27 and we expect to provide PPG comments on the draft FS on May 18th. Also, we are tentatively planning a presentation by PPG on the draft FS on May 11th to EPA staff and NJDEP.
- We are preparing a community involvement plan to coincide with the release of the proposed plan this summer.